

(7) house, then I would have been in the car longer
 (8) than if she didn't.
 (9) **MS. CHIARAVALLOTI:** No. The
 (10) question is, can you give him any idea
 (11) of how long you were in that car,
 (12) minutes, hours? If you can.
 (13) **THE WITNESS:** I can't remember.
 (14) *Q. Do you recall any of the roadways*
 (15) *you would have been on before the accident*
 (16) *occurred? From the time you got in Miss*
 (17) *Olson's car?*

(18) **A. I think we were on – I only**
 (19) **remember one road.**
 (20) *Q. What road was that?*
 (21) **A. I don't remember the name of it,**
 (22) **but I think it's parallel to the Thruway and**
 (23) **it's a pretty large road. A very well-traveled**
 (24) **road, and I think that's where the accident**
 (25) **took place.**

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(1)
 (2) *Q. Do you recall what road the*
 (3) *accident took place on?*
 (4) **A. I don't know the name of it.**
 (5) *Q. Do you know the compass direction*
 (6) *you were heading?*
 (7) **MS. CHIARAVALLOTI:** North, south
 (8) east or west? It's either yes or no.
 (9) **A. No.**
 (10) *Q. If I told you the road was Route*
 (11) *32, does that refresh your memory?*
 (12) **A. I don't know if that's true or not.**
 (13) *Q. Did you have any warning that an*
 (14) *accident was about to occur?*
 (15) **A. I don't understand the question.**
 (16) *Q. At any time before the accident*
 (17) *occurred, did you hear anything that would have*
 (18) *given you an indication that an accident was*
 (19) *about to occur?*
 (20) **A. No.**
 (21) *Q. Did you hear any horns before the*
 (22) *accident?*
 (23) **A. I don't remember.**
 (24) *Q. Did you hear any screeching of*
 (25) *brakes?*

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(1)
 (2) **A. I don't remember.**
 (3) *Q. When you got into Ms. Olson's*
 (4) *vehicle was there anyone else in the car?*
 (5) **A. No.**
 (6) *Q. Did Ms. Olson stop for any reason,*
 (7) *to the best you know, from the time you got in*
 (8) *the car until the time of the accident?*
 (9) **A. Yes.**
 (10) *Q. For what reason?*
 (11) **A. I don't remember.**
 (12) *Q. Did she stop off at a store or*
 (13) *restaurant?*
 (14) **A. No.**

(15) *Q. Did she stop for traffic or a*
 (16) *traffic signal?*
 (17) **A. She stopped, I think, for a signal**
 (18) **or a school bus, or possibly both.**
 (19) *Q. When you say a school bus, was that*
 (20) *a bus that was in front of you?*
 (21) **A. I believe there was a school bus at**
 (22) **some point in front of us.**
 (23) *Q. Do you recall any construction on*
 (24) *the roadway before the accident?*
 (25) **A. I don't recall.**

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(1)
 (2) *Q. Were you having any conversation*
 (3) *with Ms. Olson while you were in the car?*
 (4) **A. I don't recall any conversation.**
 (5) *Q. Were you eating inside the car?*
 (6) **A. No.**
 (7) *Q. Were you drinking inside the car?*
 (8) **A. No.**
 (9) *Q. Were you smoking inside the car?*
 (10) **A. No.**
 (11) *Q. Were any of the windows in the car*
 (12) *open?*
 (13) **A. I don't know.**
 (14) *Q. Was there anything that obstructed*
 (15) *your view out of the front of the vehicle?*
 (16) **A. No.**
 (17) *Q. Was there anything that obstructed*
 (18) *your view out of either side of the vehicle?*
 (19) **A. No.**
 (20) *Q. Were any of the windows tinted?*
 (21) **A. I don't know.**
 (22) *Q. Was the car equipped with*
 (23) *seatbelts?*
 (24) **A. Yes.**
 (25) *Q. Were you wearing a seatbelt at the*

Page 78

(1)
 (2) *time of the accident?*
 (3) **A. Yes.**
 (4) *Q. What type of seatbelt?*
 (5) **A. Type?**
 (6) *Q. Was it an automatic seatbelt that*
 (7) *closes when the door closes?*
 (8) **A. No.**
 (9) *Q. One you have to put on manually?*
 (10) **A. Yes.**
 (11) *Q. Was it across your waist and across*
 (12) *your chest, or something different?*
 (13) **A. I believe it was across my waist**
 (14) **and chest.**
 (15) *Q. When did you first put the belt on?*
 (16) **A. I'm sure I put it on as soon as I**
 (17) **got in the car.**
 (18) *Q. Do you have a specific recollection*
 (19) *of doing that?*
 (20) **A. No, but I always do it. I have a**
 (21) **stepson who was very badly injured in a car**
 (22) **accident, that's why I always do that.**

BSA

10/26/07 WEISS vs CREEM

WITNESS: J. H. WEISS

XMAX(198/18)

- (23) Q. Did you have a cell phone with you?
 (24) A. Yes, but it was not recovered.
 (25) Q. Were you using a cell phone at any

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- (1)
 (2) time before the accident?
 (3) A. I don't believe so.
 (4) Q. Did you have a PDA?
 (5) A. Yeah, it was not recovered, the
 (6) PDA.
 (7) Q. Were you using the PDA or the cell
 (8) phone at any time before the accident occurred?
 (9) A. You mean while in Miss Olson's car?
 (10) Q. Yes.
 (11) A. No.
 (12) Q. Did you have a valid license at the
 (13) time of the accident?
 (14) A. Yes.
 (15) Q. Was that issued in New Jersey?
 (16) A. New Jersey.
 (17) Q. Did it have any restrictions on it,
 (18) for vision or anything else?
 (19) A. No.
 (20) Q. Do you wear glasses or contacts
 (21) now?
 (22) A. Yes.
 (23) Q. For what reason?
 (24) A. To see better.
 (25) Q. So, you wear them for general

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- (1)
 (2) sight, as opposed to for reading?
 (3) A. Yes.
 (4) Q. Did you wear contacts or glasses on
 (5) the date of the accident?
 (6) A. You mean at the very moment of the
 (7) accident? Probably not.
 (8) MS. CHIARAVALLOTI: Just for
 (9) clarification, are you wearing contacts
 (10) right now?
 (11) THE WITNESS: No, I don't wear
 (12) contacts.
 (13) MS. CHIARAVALLOTTI: She only wears
 (14) reading glasses.
 (15) THE WITNESS: No, that's not true.
 (16) MS. CHIARAVALLOTI: What do you
 (17) mean?
 (18) THE WITNESS: These are for vision.
 (19) MS. CHIARAVALLOTI: Oh, for
 (20) distance? I'm sorry. I didn't know.
 (21) Q. Do you recall having glasses on
 (22) when the accident occurred?
 (23) A. No, I don't know.
 (24) Q. Do you recall having contacts in
 (25) at -

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- (1)
 (2) A. - I don't wear contacts.
 (3) Q. How did you know that an accident
 (4) had taken place, if at all?

- (5) A. Something slammed into us.
 (6) Q. From what direction?
 (7) A. Behind.
 (8) Q. Do you know what that was?
 (9) A. I couldn't see it.
 (10) Q. Did you ever learn what that was?
 (11) A. Well, yesterday -
 (12) MS. CHIARAVALLOTI: You mean
 (13) personally because she observed it or
 (14) because she was told?
 (15) MR. O'SHAUGHNESSY: Personally.
 (16) A. No.
 (17) MS. CHIARAVALLOTI: You were
 (18) shaking your head no.
 (19) A. I'm sorry. For you, this is a job.
 (20) For me, this is a terrifying memory. You think
 (21) it's funny, it's not. You both don't realize
 (22) what it's like for me to relive it.
 (23) Q. I'm not laughing.
 (24) A. I just want you to know, for you
 (25) it's a job. For me, it's a terrifying memory.

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- (1)
 (2) MS. CHIARAVALLOTI: He's not
 (3) laughing. Let's get through it as
 (4) quickly as possible then.
 (5) Q. Did you later come to learn from
 (6) any source what you had an accident with?
 (7) A. I don't remember. A car I guess.
 (8) I mean, what else would it be?
 (9) Q. Did you ever have any conversations
 (10) with the, using your term, the car, that you
 (11) had an accident with?
 (12) A. Have a conversation with the car?
 (13) Q. Did you have a conversation with
 (14) anyone who was the operator or passenger in the
 (15) vehicle you had the accident with?
 (16) A. No.
 (17) Q. Did you ever have any conversations
 (18) with Ms. Olson after the accident at the scene
 (19) of the accident?
 (20) A. I don't think we spoke at the scene
 (21) of the accident.
 (22) Q. Earlier, we talked about how you
 (23) had conversations with Miss Olson after the
 (24) accident. Were those by phone, e-mail, or
 (25) something else?

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- (1)
 (2) A. I couldn't talk because my voice
 (3) was very - my chest got hurt. I couldn't
 (4) talk, but she was e-mailing me and calling me.
 (5) Q. For what reason was she e-mailing
 (6) and calling you?
 (7) A. To sell me houses.
 (8) Q. Were you in the market for a new
 (9) home?
 (10) A. I was in the market for an old
 (11) home.
 (12) Q. When I say a new home, I mean a new

BSA

10/26/07 WEISS vs CREEM

WITNESS: J. H. WEISS

XMAX(199/19)

(13) residence for you?
 (14) A. Yes, but it was really for my – so
 (15) I could continue to care for my mother, who I
 (16) had been caring for for eight years. My mother
 (17) passed away in December, but I didn't know she
 (18) was going to be passing away.
 (19) Q. When you say you were caring for
 (20) your mother for eight years, was she residing
 (21) with you?
 (22) A. Part of the time.
 (23) Q. What do you mean by part of the
 (24) time?
 (25) A. When she was well enough to reside

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(1)
 (2) with me she did, and when she wasn't she
 (3) resided at the Hebrew Home for the Aged in
 (4) Riverdale, where I also had full-time care for
 (5) her privately for a bunch of years. I had
 (6) full-time care for her at her apartment for a
 (7) bunch of years, and then I had part-time care
 (8) for a period of time. I did everything I could
 (9) for eight years.
 (10) Q. Without getting too personal, for
 (11) what reason were you caring for your mom at
 (12) your home?
 (13) A. To try to give her the best quality
 (14) care.
 (15) Q. From what was she suffering?
 (16) A. Initially, her aorta dissected, and
 (17) subsequent to that – which required a lot of
 (18) resectioning, she then needed a lot of rehab,
 (19) and then she had seven strokes. Not every day,
 (20) but over a period of eight years. Because it
 (21) wasn't resected that well and it was – and
 (22) pieces of it would throw, they called it.
 (23) Q. And go into her bloodstream and
 (24) affect her brain?
 (25) A. Well, it could be anything really,

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(1)
 (2) but in her case there were seven strokes, and
 (3) many, many other problems.
 (4) Q. Are you an only child?
 (5) A. Yes.
 (6) Q. Is your father living?
 (7) A. No.
 (8) Q. When did he pass?
 (9) A. When I was 18.
 (10) Q. Do you know what he died of?
 (11) A. Cancer.
 (12) Q. What type?
 (13) A. The bowel duct.
 (14) Q. You said your mom passed in
 (15) December? Is that '06?
 (16) A. Yes.
 (17) Q. Do you know what she passed of,
 (18) ultimately?
 (19) A. Maybe dehydration. I think she
 (20) stopped eating.

(21) Q. Prior to having the strokes, did
 (22) she have any history or family history of
 (23) stroke?
 (24) A. I don't know. A lot of our family
 (25) was killed by the Nazis. There's not a lot of

Page 86

(1)
 (2) family history.
 (3) Q. When did she first develop the
 (4) stroke?
 (5) A. February after –
 (6) Q. Of what year?
 (7) A. Eight years before she died.
 (8) Q. So, 1998, give or take?
 (9) A. I guess so.
 (10) Q. And from 1998 forward to December
 (11) of 2006, she had a series of six strokes over
 (12) that period of time?
 (13) A. I believe so. And mini-strokes –
 (14) - I'm talking about the major ones.
 (15) Q. Was she in your home, let's say,
 (16) was she in your home for the years 2004, 2005,
 (17) and 2006, before and after the accident?
 (18) A. Off and on.
 (19) Q. Was that a source of concern for
 (20) you?
 (21) A. Yes.
 (22) Q. Was that a source of stress for
 (23) you?
 (24) A. Yes.
 (25) Q. Was that a source of anxiety for

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(1)
 (2) you?
 (3) MS. CHIARAVALLLOTI: Objection to
 (4) the form. You can answer.
 (5) A. It's a big responsibility. She was
 (6) in diapers. I mean, I was a single mom of a
 (7) child, and a single mom of a mom, and I was
 (8) running a media business which is not known for
 (9) its gentle, kind ways.
 (10) Q. Was your daughter living with you?
 (11) A. Yes.
 (12) Q. For what period of time did your
 (13) daughter live with you?
 (14) A. From the time she was born until
 (15) she went to college.
 (16) Q. Which is when?
 (17) A. Well, she's a junior now. I'm not
 (18) good with dates.
 (19) Q. Approximately.
 (20) A. This is her third year, so –
 (21) Q. So, she went to college,
 (22) approximately 2004, is that fair?
 (23) A. This is 2007 – she started –
 (24) MS. CHIARAVALLLOTI: If you can't
 (25) figure it out, then that's your answer.

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(1)
 (2) I don't know.

(3) **THE WITNESS:** I don't even know
 (4) what month it is right now. It takes me
 (5) a lot of effort to figure things like
 (6) this out, but my daughter is a junior in
 (7) college.
 (8) *Q. She is still at Sarah Lawrence?*
 (9) **A.** Yes, but I think next semester she
 (10) might be going to Florence with NYU.
 (11) *Q. How would you describe the*
 (12) *visibility on the day of the accident? Any*
 (13) *problems with the weather, rain or snow?*
 (14) **A.** Possibly it was a tiny bit of
 (15) dampness, but nothing to speak of.
 (16) *Q. Were the roadways wet, dry,*
 (17) *something else?*
 (18) **A.** They might have been slightly damp.
 (19) *Q. Do you recall it raining at all*
 (20) *prior to the time of the accident?*
 (21) **A.** I may have been slightly damp.
 (22) *Q. Other than saying dampness, do you*
 (23) *—*
 (24) **A.** — I don't recall.
 (25) *Q. The roadway in the area where the*

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(1)
 (2) accident occurred, was it one-way, two-ways?
 (3) **A.** As I recall, but I don't think I
 (4) recall it very well.
 (5) *Q. Just what you remember.*
 (6) **A.** I think it had several lanes in
 (7) each direction, possibly three. It was a major
 (8) road.
 (9) *Q. When you say several lanes in each*
 (10) *direction, these are lanes for moving travel?*
 (11) **A.** Moving travel.
 (12) *Q. It was a two-way street?*
 (13) **A.** Two-way.
 (14) *Q. When the accident occurred, was*
 (15) *your vehicle moving or stopped?*
 (16) **A.** I don't know. If it was moving at
 (17) all, it wasn't moving fast.
 (18) **MS. CHIARAVALLOTI:** If you don't
 (19) know, you can't speculate. Don't do
 (20) that, Judy. You don't know.
 (21) *Q. What makes you believe if it wasn't*
 (22) *stopped, it wasn't moving fast?*
 (23) **A.** Because I remember this thing with
 (24) the school bus. I think I have some memory of
 (25) a school bus.

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(1)
 (2) *Q. Was the school bus stopped, then*
 (3) *moving again?*
 (4) **A.** That's what I don't remember.
 (5) *Q. Do you recall anything else in the*
 (6) *general vicinity, such as retail stores, gas*
 (7) *stations?*
 (8) **A.** The only thing I remember at this
 (9) time, maybe ever, is that when Betty's car got
 (10) hit, we went across all the lanes of traffic

(11) and then we came back somehow, and I recall I
 (12) think there was either a gas station that we
 (13) landed at and then came back from that was on
 (14) the opposite side, like this way —
 (15) *Q. Tell me in words.*
 (16) **A.** Well, I think we went across this
 (17) highway, whatever road it is, and crossed all
 (18) the way into traffic and back, but I think at
 (19) the time we hit that other side there was some
 (20) kind of commercial establishment, possibly a
 (21) gas station.
 (22) *Q. The car that you were riding in,*
 (23) *did it have one impact, or more than one*
 (24) *impact?*
 (25) **A.** I don't know.

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(1)
 (2) *Q. Do you know if the car had air*
 (3) *bags?*
 (4) **A.** I don't know.
 (5) *Q. Do you recall air bags going off?*
 (6) **A.** No.
 (7) *Q. No, you don't recall?*
 (8) **A.** I don't recall, and we were hit
 (9) from behind, so I don't think they would have.
 (10) *Q. Did the driver of the vehicle tell*
 (11) *you at any time before the accident that you*
 (12) *were about to have an accident?*
 (13) **A.** No.
 (14) *Q. Did the driver of the vehicle tell*
 (15) *you she was having any problems with the*
 (16) *vehicle?*
 (17) **A.** No.
 (18) *Q. What, if anything, was the driver*
 (19) *doing before the accident, in terms of the*
 (20) *operation of the vehicle?*
 (21) **A.** Sitting at the wheel.
 (22) *Q. Do you know if she had her seatbelt*
 (23) *on?*
 (24) **A.** I certainly believe she did.
 (25) *Q. Had you consumed any alcohol in the*

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(1)
 (2) 24 hours before the accident?
 (3) **A.** Had I?
 (4) *Q. Yes.*
 (5) **A.** I don't think so. I almost never
 (6) have any alcohol.
 (7) *Q. Had you consumed any drugs,*
 (8) *prescription or otherwise, in the 24 hours*
 (9) *prior to the accident?*
 (10) **A.** I probably took my thyroid
 (11) medication.
 (12) *Q. Is that Synthroid?*
 (13) **A.** Yes. Well, it's generic.
 (14) *Q. When were you first diagnosed with*
 (15) *a thyroid condition?*
 (16) **A.** About 20 years ago.
 (17) *Q. Is that Hashimoto syndrome?*
 (18) **A.** I think it is.

(15) Q. Did you –
 (16) A. – but I think he read all her test
 (17) results.
 (18) Q. Did you make any complaints to him
 (19) at that time?
 (20) A. Probably just answered whatever
 (21) questions he asked me.
 (22) Q. Did he give you a diagnosis or tell
 (23) you anything about your condition?
 (24) A. He told me that if I was moving to
 (25) Virginia, which I was, I should see Dr. Barth,

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(1) who
 (2) and I think he told me I have a TBI. I think
 (3) he told me that I have a traumatic brain
 (4) disorder, or injury and I think that might
 (5) be – I don't know if he or Charlotte was the
 (6) first person to use that term for me.
 (7) Q. After Dr. Silver, who would have
 (8) been the next doctor you saw?
 (9) A. Dr. Barth.
 (10) Q. That's in Virginia?
 (11) A. Yes.
 (12) Q. How many times did you see Dr.
 (13) Barth?
 (14) A. I don't know.
 (15) Q. That's a man?
 (16) A. A man. More than two and fewer
 (17) than five.
 (18) Q. Did Dr. Barth do any tests for you?
 (19) A. No.
 (20) Q. Did you make any complaints to Dr.
 (21) –
 (22) A. – well, I shouldn't say that. I
 (23) think he does the kind of testing that's
 (24) verbal. He asks a lot of questions and take a
 (25) lot of notes.

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(1) who
 (2) Q. Anything where you had to fill out?
 (3) A. No.
 (4) Q. Did he give you his opinion?
 (5) A. I think he told me that he was very
 (6) concerned about me and he didn't think that
 (7) there was – and this was very disappointing
 (8) for me to hear – he didn't think there was a
 (9) place at Charlottesville or UVA that would be
 (10) the right kind of place for my treatment and he
 (11) thought he needed to refer me to Dr. O'Shanick.
 (12) That's in Richmond, and Richmond is not near
 (13) Charlottesville.
 (14) Q. For what reason did you decide to
 (15) move to Virginia?
 (16) A. I couldn't afford to live in New
 (17) York without an income.
 (18) Q. Who was the next doctor you saw
 (19) after Dr. Barth?
 (20) A. Dr. O'Shanick as far as – well, I
 (21) also have a primary care physician in Virginia.
 (22) Q. Who was that?

(23) A. Doctor Andrew Lockman. In Virginia
 (24) you have to have the primary care physician to
 (25) see anybody else. So, I had to see Lockman in

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(1) who
 (2) order to see anybody else. Do you follow what
 (3) I'm saying?
 (4) Q. Sure. What was Dr. Lockman's
 (5) specialty?
 (6) A. Internal medicine.
 (7) MR. O'SHAUGHNESSY: I'm going to
 (8) call for an authorization for him.
 (9) A. He didn't really treat me for the
 (10) accident.
 (11) Q. When you go to him do you make
 (12) complaints about how you were feeling?
 (13) A. I'm sure I told him that I had an
 (14) accident, and that I had migraines.
 (15) Q. How many times did you treat with
 (16) him?
 (17) A. Between five and ten. Sometimes
 (18) they had to actually put me on IVs for
 (19) migraines.
 (20) Q. Are you still seeing him?
 (21) A. If I had a bad situation I would
 (22) see him.
 (23) Q. Dr. O'Shanick, you said he's in
 (24) Richmond?
 (25) A. Yes.

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(1) who
 (2) Q. How many times have you seen him in
 (3) his office?
 (4) A. Well, probably about six. I'm not
 (5) sure.
 (6) Q. Are you still treating with his
 (7) office?
 (8) A. They're still evaluating me. They
 (9) do a lot of testing.
 (10) Q. When you say testing, what do you
 (11) mean?
 (12) A. They do somewhat similar stuff to
 (13) what Dr. Tomaino did, but more – well, I think
 (14) they think it's more sophisticated. I think
 (15) they think it's more revealing or fine-tuned.
 (16) Q. Can you give me an idea of what
 (17) sorts of tests they are doing?
 (18) A. I think they are trying to get a
 (19) handle on where my deficits are and why I have
 (20) them and how they could be treated.
 (21) Q. This is with respect to your
 (22) cognitive abilities?
 (23) A. Yes.
 (24) Q. Can you give me an idea of what the
 (25) tests are doing?

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(1) who
 (2) A. Well, so far, most of them have
 (3) been in the areas of language and memory that's
 (4) language related. We just started, I think in

(5) my last visit doing, um, doing things that are
(6) related more to numbers and linear things,
(7) time, space, and I – my problems as I perceive
(8) them, are much, much, less in the language area
(9) and much more in every other area. And they
(10) just started evaluating that area.

(11) Q. So, you're still treating with that
(12) office?

(13) A. Yes and they expect me to be there
(14) for a couple of years.

(15) Q. Are you still treating with anyone
(16) else other than Dr. Lockman and Dr. O'Shanick?

(17) A. Yes. Dr. Isaacs.

(18) Q. Where is he located?

(19) A. In Richmond.

(20) (Whereupon, an off-the-record

(21) discussion was held.)

(22) Q. When was the first time you treated
(23) with Dr. Isaacs' office?

(24) A. I don't know. I'm not good at even
(25) knowing when.

Page 172

(1) who

(2) Q. Was it in 2007?

(3) A. Yes. I don't really know, but I'm
(4) going to guess July or August.

(5) Q. Don't guess. Is that a fair
(6) estimate?

(7) A. It's as good as I can do.

(8) Q. Summer of 2007? Is that a better
(9) estimate?

(10) A. It's good as I can get without
(11) looking at my calendar.

(12) Q. Did you ever treat with Dr. Isaacs
(13) before this accident?

(14) A. No.

(15) Q. How were you referred to Dr.
(16) Isaacs?

(17) A. O'Shanick.

(18) Q. How many times did you treat with
(19) his office?

(20) A. I would say maybe about six or
(21) seven times.

(22) Q. You're continuing to be treated?

(23) A. Yes.

(24) Q. What sorts of complaints do you
(25) make to Dr. Isaacs?

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(1) who

(2) A. Migraines.

(3) Q. Anything else?

(4) A. Well, the frequency with which they
(5) are coming, it's horrendous. That's why I'm on
(6) so many medications.

(7) Q. How frequent would you say they
(8) are?

(9) A. Very. Almost daily and often they
(10) don't go away for days at a time.

(11) Q. When you do get the migraine, does
(12) the medication that is prescribed assist in

(13) getting rid of the headaches?

(14) A. Well, the Zomig assists in getting
(15) rid of the headaches, but the problem is I
(16) can't take Zomig all the time because it's
(17) dangerous.

(18) Q. Do you know why?

(19) A. I think it can affect your liver
(20) and your heart.

(21) Q. Are you getting periodic blood
(22) tests?

(23) A. Yes.

(24) Q. Have you experienced any problem
(25) yet in terms of your blood tests?

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(1) who

(2) A. Not that anyone has made me aware
(3) of.

(4) Q. Any other doctors or medical
(5) providers that we have yet to talk about that
(6) you have seen since the accident?

(7) A. I see a guy who does –

(8) MS. CHIARAVALLOTI: He's a
(9) therapist.

(10) Q. Anybody under the canvas of
(11) medical?

(12) A. Um, I think he does – I think –
(13) oh, I saw that other guy who referred me to
(14) Brian.

(15) MS. CHIARAVALLOTI: Oh, Bauer.

(16) THE WITNESS: These two doctors,

(17) who are western, you know, MDS. Dr.

(18) Bauer and Dr. Isaacs referred me to get

(19) therapeutic massage to try to change or

(20) alleviate some of the pressure that they

(21) think, um, might be happening because of

(22) some stuff the cervical –

(23) MS. CHIARAVALLOTI: Migraines.

(24) THE WITNESS: Make it clench up and

(25) stuff.

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(1) who

(2) Q. Who is doing that for you?

(3) A. A guy named Brian Keena.

(4) Q. Where is his office?

(5) A. He's in Charlottesville.

(6) Q. When did you first start treating
(7) with him or his office?

(8) A. Okay, it's probably in, I'm going
(9) to guess April or May but, I don't really

(10) remember.

(11) Q. Of 2007?

(12) A. Yes.

(13) Q. Are you still treating?

(14) A. Yes.

(15) Q. How often do you go there?

(16) A. Once or twice a week.

(17) Q. How long a session?

(18) A. An hour or an hour and a half,

(19) depending on how much time he has. He's very,

(20) very booked and he only works with doctors.